

**Federal Defenders
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November 13, 2023

BY EMAIL

Honorable Robert W. Lehrburger
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007
Email: Lehrburger_NYSDChambers@nysd.uscourts.gov

GRANTED. So Ordered.



Robert W. Lehrburger, USMJ

Nov. 13, 2023

**Re: United States v. Eduardo Suazo Nunez
20 MJ 847**

Dear Judge Lehrburger:

I write to respectfully request that the Court modify Mr. Suazo Nunez's bail conditions to allow Pretrial Services to remove his ankle monitor for a medical procedure scheduled for Wednesday, November 15, 2023, as well as for future medical appointments. The Government and Pretrial Services consent to this request.

On September 26, 2023, Magistrate Judge Ona T. Wang ordered Mr. Suazo Nunez released on his own signature and several additional bail conditions, including *inter alia* a curfew enforced via electronic monitoring. Since his release, Mr. Suazo Nunez has fully complied with his bail conditions.

Separately, Mr. Suazo Nunez has been receiving medical attention for a work injury that will eventually require knee surgery. In preparation for this surgery, he has an MRI scheduled for this upcoming Wednesday, November 15, 2023. *See* Exhibit A (Appointment Reminder). He has been informed that his electronic ankle monitor must be removed for the MRI, as well as for his eventual (but not yet scheduled) surgery.

Accordingly, I write to request permission for Pretrial Services to remove Mr. Suazo Nunez's ankle monitor for this Wednesday's appointment, as well as for future medical appointments, provided Mr. Suazo Nunez provide documentation of his appointments to Pretrial Services. As noted above, the Government and Pretrial Services both consent to this request.

Sincerely,

/s/ Hannah McCrea

Hannah McCrea
Assistant Federal Defender
(646) 574-0351

CC: AUSA David Robles
USPSO Marlon Ovalles

EXHIBIT A



LENOX HILL RADIOLOGY

Appointment Reminder

Patient Information:

Patient Name: EDUARDO SUAZO NUNEZ
Patient MRN: 12313806R

Appointment Information

Procedure Date/Time: Wednesday November 15 2023 5:30 PM
Procedure Description: MR Knee WO

- Prep:
- There is no prep necessary!
 - If you have a pacemaker or heart defibrillator and you did not notify us at the time of scheduling please call us as soon as possible.
 - If you have a Neurostimulator you MUST bring your remote/programming device and it MUST be FULLY charged.
 - If you wear a cardiac monitor, Medtronic drug infusion system, nerve stimulator, programmable shunt, stent, eye or ear implant we need the following information in order to ensure it is safe for you to have your exam. If you provided us this information while scheduling your exam or we have documented this from a prior MR appointment you don't need to do anything more. If you were unable to provide your implanted device information while scheduling please call us at least 3 days in advance of your appointment to provide the below information.
 - We require:
 - ~Device Name
 - ~Device Model (Vendor name)
 - ~Surgical Date of Implant
 - Please remove hairpins and jewelry prior to arriving for your appointment.
- If you wear a Continuous Glucose Monitoring Device and/or an Insulin Pump or Neulasta device, for your safety you will have to remove the device before having your exam. The exam cannot be performed with the device in place regardless of the procedure or body part being imaged. Please bring a replacement sensor/transmitter to wear following your exam. You will be able to reconnect your Insulin Pump following the completion of your exam.

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